

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:20-MJ-582

RICKY BADLEY (01)

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

From in or about September 2019, continuing through in or about June 2020, in the Fort Worth Division of the Northern District of Texas, **Ricky Badley**, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services, and electronic communication services of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, that is: **Badley** repeatedly used text messages, mailed letters, and used social media applications to injure, harass, and intimidate to V-1.

In violation of 18 U.S.C § 2261A(2)(B).

INTRODUCTION

1. I, R. Knipfing, further state that I am a U.S. Postal Inspector with the U.S. Postal Inspection Service (USPIS) and have been so employed since approximately July 2005. I am currently assigned to the USPIS Fort Worth Division's Contraband Interdiction and Investigations Team that conducts, but is not limited to, investigations into narcotics, dangerous and threatening mail and child exploitation.

As part of my duties as a U.S. Postal Inspector, I am authorized to investigate violations relating to threatening and harassing communications, specifically those sent via the U.S. mail, in violation of 18 U.S.C § 2261A(2)(B). I have gained experience in conducting these investigations through training and through every day work, to include executing search warrants and conducting interviews of individuals who have used the mail, interactive computer services, and electronic communication services of interstate commerce, such as social media and text messaging, to threaten, harass and intimidate others.

2. This affidavit is submitted in support of a criminal complaint alleging that **Ricky Badley** has violated 18 U.S.C § 2261A(2)(B). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging **Ricky Badley** with a violation of section 2261A(2)(B), I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint. The information contained in this affidavit is from my personal knowledge and from information provided to me by other law enforcement personnel involved in the investigation.

FACTS SUPPORTING PROBABLE CAUSE

3. From in or about April 2014, until in or about March 2020, **Ricky Badley** was a coach and teacher at V-1's high school in the Northern District of Texas. During the 2019-2020 school year, V-1 was 16 years old and in her junior year.

The high school permitted its faculty and staff members to text students using approved means or via a group text. Beginning in or about January 2019, however, **Badley** started sending individual text messages from his personal cell phone to V-1's personal cell in violation of these standards. In January 2020, when school administrators became aware of his conduct, **Badley** was asked to submit his resignation, which he signed on January 27, 2020. His employment was officially terminated on March 6, 2020.

4. In May 2019, at a high school track banquet, **Badley** told V-1 she was his "new favorite," stating that his last favorite had graduated. In July 2019, **Badley** attended a club-sponsored track meet in College Station, Texas, where V-1 was competing. The out-of-town meet was not part of a school-sponsored event, and **Badley** was not affiliated with any of the clubs competing in the event.

5. Beginning in or about August 2019, **Badley** advised V-1 she could come to his classroom to assist with projects, finish her homework, or just relax. **Badley** stocked a drawer with V-1's favorite snacks and started referring to V-1 as "little girl." On one occasion, when V-1 and **Badley** were alone together talking in **Badley's** classroom, another teacher entered. V-1 recalled feeling very uncomfortable after the other teacher walked in. V-1 stated that **Badley** hugged her each time she left his classroom. She thought that was strange, but added that he didn't "try anything."

6. In October 2019, V-1 began dating a high school baseball player, who later became her boyfriend. **Badley** demanded that V-1 bring her boyfriend to meet him, so that **Badley** could "interrogate" him and approve of the relationship. V-1 did not want **Badley** to "scare off" the boy; thus, she refused to introduce him to **Badley**.

Badley was offended and sent V-1 a text message stating, “If you don’t trust me anymore than that then don’t bother coming around.” Shortly thereafter, on October 29, 2019, **Badley** apologized via text message to V-1 and V-1’s mother for his behavior stating, “I’m beyond sorry” and “I’m going to step back . . . I lost your trust and will pay the consequences.”

7. During November and December 2019, **Badley** increased the number of individual texts he sent to V-1. On or about November 8, 2019, **Badley** texted V-1 saying, “You mean so much to me” “you are definitely one of the special people in my life” and “I’ve noticed how you don’t feel comfortable giving me the daily hug we always had . . . I feel like I’m forcing you to do it now and I promise I’ll stop.”

8. Starting in mid-December 2019, and continuing through early April 2020, V-1, her family, classmates and **Badley** received numerous letters through the mail, which discussed unfounded sexual encounters between V-1 and her boyfriend. The same group received other letters, which stated that the initial letters were merely a joke to try and get **Badley** to “go ballistic” on V-1’s boyfriend.

9. Most of the letters consisted of a white sheet of paper, with computer printed wording. The envelopes did not have a return address and the addressee information was printed on a larger sheet of paper, cut to size and adhered to the envelope. Two letters dated January 16, and 21, 2020, were not computer printed. These two letters were made using self-adhesive sticker letters and were sent to V-1’s parents. The addressee information on these two envelopes was cut out of a larger sheet of paper and adhered to the envelope, this is consistent with other mailings received.

10. V-1's parents received a letter postmarked February 3, 2020, requesting that V-1 produce two TikTok videos. Video 1 was supposed to show V-1 eating a whole banana. Video 2 was supposed to show V-1 twerking for "AT LEAST 10 seconds." The letter threatened to release additional disparaging information about V-1, if the videos were not posted on TikTok by February 8, 2020.

11. On or about February 7, 2020, TikTok account @tchsgossip was created via **Badley's** home IP address. His account, @tchsgossip, had no followers and only followed V-1's TikTok account. The AT&T account associated with the IP address used to create @tchsgossip showed the billing address as **Badley's** North Richland Hills, Texas home address.

12. On February 17, 2020, **Badley** was observed in his vehicle, a 2016 red Dodge Ram 1500 pickup truck, at the U.S. mail collection boxes located on Trail Lake Drive in Fort Worth, Texas. Postal inspectors were notified. An hour later, a postal inspector opened the collection box and found 13 letters bearing similar characteristics to the letters previously mailed to V-1, her family, and classmates. The postal inspector opened the letters with the consent of the addressees. Each envelope contained one printed letter with the first and last name of V-1 printed vertically. As would appear in a haiku poem, each letter was used to create vulgar words or phrases regarding V-1, including N- Nymphomaniac, S- Skank, C- Cum Dump, and R- Rump Raid.

The second page of the letter, dated February 17, 2020, was a color photo depicting black panties with what appears to be semen in the crotch area. The phrase, “(V-1’s name) cum stained panties!” was printed in red on the photo.

13. The postage used for these letters was purchased on February 6, 2020, at a U.S. Postal Service (USPS) self-service kiosk, using a JP Morgan Chase Bank credit card belonging to **Badley**. **Badley’s** credit card statement for that account listed the kiosk purchase.

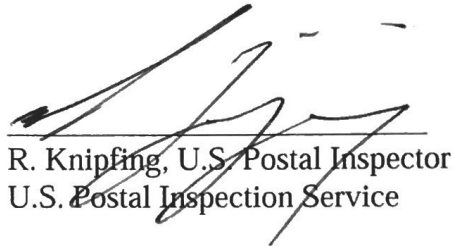
14. **Badley’s** Texas driver’s license bears the same North Richland Hills address associated with the credit card and the TikTok account. The photograph on **Badley’s** driver’s license matches the photograph taken at the USPS kiosk of the individual purchasing the postage affixed to the harassing letters.

15. In or around January 2020, V-1’s mother identified **Badley’s** vehicle driving by her home. V-1’s mother asked **Badley** via text message why he was driving by her home. **Badley** explained that he was checking on a friend who lived near them, and that he was not looking for V-1. More recently, on or about June 3, 2020, V-1 stated **Badley** drove by her private athletic practice. V-1 stated that **Badley** pulled into a parking space and then quickly drove away. V-1 identified **Badley** as the driver and the vehicle as **Badley’s**.

16. The letters, text messages, and social media usage caused V-1 and her family substantial emotional distress.

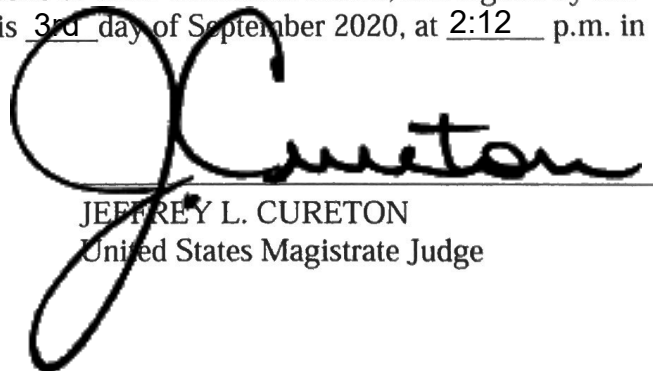
CONCLUSION

17. Based upon the aforementioned facts and circumstances, I believe there is probable cause to find that **Ricky Badley** has committed a violation of 18 U.S.C § 2261A(2)(b), in that, with the intent to harass and intimidate another person, he used the mail, interactive computer services, and electronic communication services of interstate commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person. I therefore request the Court issue a warrant authorizing the arrest of **Ricky Badley**.



R. Knipfing, U.S. Postal Inspector
U.S. Postal Inspection Service

Sworn to me, over the telephone or other electronic means, and signed by me pursuant to Fed.R.Crim.P.4.1 on this 3rd day of September 2020, at 2:12 p.m. in Fort Worth, Texas



JEFFREY L. CURETON
United States Magistrate Judge